

# **EXHIBIT 4**

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES  
INNOVATIONS, LLC

Plaintiff,

V.

GUARDIAN PROTECTION SERVICES, INC.

ADS SECURITY, LP

*Defendants.*

[illegible]

2:15-cv-01431-JRG-RSP  
(Lead Case)

2:15-CV-01463-JRG-RSP

## DECLARATION OF ROTHSCHILD CONNECTED DEVICES INNOVATIONS, LLC

I, Leigh M. Rothschild, declare as follows:

1. I am managing member of Rothschild Connected Devices Innovations, LLC (“RCDI”). I am over the age of twenty-one, I am competent to make this Declaration, and the facts set forth in this Declaration are based upon my personal knowledge and documents provided and maintained by me in the ordinary course of business.

2. RCDI currently owns the following patents and patent application by assignment:

- i. United States Patent No. 7,889,713;
- ii. United States Patent No. 8,417,377;
- iii. United States Patent No. 8,788,090; and
- iv. United States Patent Application No. 14/337,186.

3. As of June 30, 2018, RCDI does not have any assets other than the patents listed above and a *de minimus* amount in its lone bank account. See correspondence from Michael Wasserman, CPA, RCDI's accountant, to RCDI's managing member confirming same, attached hereto as Exhibit A-1

4. As of July 10, 2018, RCDI does have an on-going patent litigation suit against the Coca-Cola Company pending in the Northern District of Georgia.

5. RCDI is represented on a contingency fee basis by the law firm of Carey Rodriguez Milian Gonya, LLP.

6. RCDI intends to use any damages collected from that matter to pay the fee award granted to ADS Security, LP (“ADS”).

7. RCDI has made counsel for ADS aware of the on-going lawsuit against the Coca-Cola Company and RCDI’s intention to pay ADS from any damages or license royalty received in that matter.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

July 10, 2018

Date: \_\_\_\_\_



\_\_\_\_\_  
Leigh M. Rothschild  
Managing Member  
RCDI, LLC